

Tuesday, March 11, 2025 at 14:48:33 Eastern Daylight Time

Subject: McCloud
Date: Thursday, May 30, 2024 at 5:47:14 PM Eastern Daylight Time
From: Gabriel Harvis <gharvis@eeplaw.com>
To: Holohan, KellyAnne (LAW) <kholohan@law.nyc.gov>, Russo, Joseph (LAW) <jorusso@law.nyc.gov>
CC: Baree Fett <bfett@eeplaw.com>
Attachments: image001.png, image002.png, image003.png, image004.png, image005.png

Good afternoon,

Thank you for taking the time. To memorialize the call --

- Spoke for 1 hour and 53 minutes today per the Court's order
- We will meet again 6/6 at 1pm
- Plan is to file a joint letter to Court early next week with a proposed adjournment of the 6/7 filing deadline to allow more time to confer – plaintiff has proposed defendants serve amended responses by 6/18 and that we ask the Court to move the filing deadline to 6/28
- Defense counsel will discuss with colleagues and we will discuss next

Per our agreement, here is a list of the responses we believe are deficient and intend to pursue and for which we ask the City to supplement its response:

Doc Req. 1j, k, l, m, n, o, p, q, v, x, z, aa, bb, ff, hh, jj, pp, qq, 2, 3, 4, 5, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22 (specifically photos of array and lineup shown to David Kurtz), 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48 (a-r), 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 60, 61, 62

Interrog. 1 (unduly limited), 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22.

I will circle back with you next week to finalize the plan for the letter. Thank you and have a nice weekend.

Gabe



Gabriel P. Harvis
Partner / Co-Chair, Civil Rights Division

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